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January 18, 2011

*Via Email & Regular Mail*  
 Hon. Paul A. Crotty, U.S.D.J.  
 United States District Court Judge  
 United States District Court For The  
 Southern District of New York  
 500 Pearl Street, Courtroom 20-C  
 New York, New York 10007

Re: *Iftikhar Ahmad v. Hartford Life And Accident Insurance Company*  
 Civ. Act. No. 10 cv 4545(PAC)(MHD)  
 Our File No.: 02489-000081

**SO ORDERED:****19 JAN 2011**

*Paul A. Crotty*  
 HON. PAUL A. CROTTY  
 UNITED STATES DISTRICT JUDGE

Dear Judge Crotty

This office represents the defendant, Hartford Life and Accident Insurance Company. We write on behalf of all parties to request a thirty-day extension of time to complete discovery and a corresponding extension of time for the briefing schedule in this matter.

By Order dated December 14, 2010, the Court granted a two-week extension of the time in which to complete discovery up to and including January 31, 2011. (Doc. No. 11). Plaintiff has expressed an intention to take depositions of three Hartford witnesses, who are located in Maitland, Florida; Simsbury, Connecticut; and Syracuse, New York. In addition, Hartford is in the process of producing documents covered by the Stipulated Protective Order entered by the Court on December 30, 2010. (Doc. No. 12). Allowing this extension is expected to provide sufficient time to complete all remaining discovery.

Accordingly, the parties respectfully request that current scheduling order be extended as follows:

<i>Description</i>	<i>Original Date</i>	<i>Proposed Date</i>
Last day to complete discovery	1/31/2011	3/2/2011 ✓
Last day to file motion for summary judgment	3/2/2011	4/1/2011 ✓
Last day to file opposition to motion for summary judgment	3/30/2011	5/2/2011 ✓
Last reply brief on motion to summary judgment	4/18/2011	5/16/2011 ✓

**FILED & ENDORSED**

Hon. Paul A. Crotty, U.S.D.J.

Re: Iftikhar Ahmad v. Hartford Life And Accident Insurance Company

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Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John T. Seybert", with a long, sweeping horizontal stroke extending to the right.

Michael H. Bernstein

John T. Seybert

Sedgwick, Detert, Moran & Arnold LLP

JTS

cc: Scott M. Riemer, Esq. (via email)